

1 Thomas C. Hurrell, State Bar No. 119876  
2 E-Mail: [thurrell@hurrellcantrall.com](mailto:thurrell@hurrellcantrall.com)  
3 Janet J. Hur, State Bar No. 330358  
4 E-Mail: [jhur@hurrellcantrall.com](mailto:jhur@hurrellcantrall.com)  
5 Jerad J. Miller, State Bar No. 334001  
6 E-Mail: [jjmiller@hurrellcantrall.com](mailto:jjmiller@hurrellcantrall.com)  
7 HURRELL CANTRALL LLP  
8 800 West 6th Street, Suite 700  
9 Los Angeles, California 90017  
10 Telephone: (213) 426-2000  
11 Facsimile: (213) 426-2020

12 Attorneys for Defendants, COUNTY OF LOS ANGELES, MARISOL BARAJAS  
13 and HECTOR VAZQUEZ

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## UNITED STATES DISTRICT COURT

### CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

JENNIE QUAN, individually and as  
successor in interest to BENJAMIN  
CHIN, deceased,

Plaintiff,

v.

COUNTY OF LOS ANGELES;  
MARISOL BARAJAS; HECTOR  
VAZQUEZ; and DOES 3-10, inclusive,

Defendants.

Case No. 2:24-cv-04805-MCS(KSx)

### **JERAD MILLER'S DECLARATION IN SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT, OR PARTIAL SUMMARY JUDGMENT**

[Assigned to Hon. Mark C. Scarsi,  
Courtroom "7C"]

### **DECLARATION OF JERAD MILLER**

1. I am an attorney duly licensed to practice before this Court and am an  
2 associate with Hurrell Cantrall LLP, attorneys of record for DEFENDANTS THE  
3 COUNTY OF LOS ANGELES, MARISOL BARAJAS, AND HECTOR VAZQUEZ  
4 herein.

2. The facts set forth herein are of my own personal knowledge and if sworn  
3 I could and would testify competently thereto.

3. I make this declaration in support of Defendants' Motion for Summary

## 1 | Judgement, or in the alternative, Motion for Partial Summary Judgment.

2 4. On September 19, 2025, I initiated formal meet and confer efforts with  
3 Plaintiff's attorney of record, Ms. Hang Le, regarding Defendants' intent to file a  
4 motion for summary judgment or partial summary judgment. On September 22, 2025,  
5 myself and Ms. Hang Le held a telephonic conference call and met and conferred on  
6 the substantive issues regarding the instant motion. **Attached hereto as Exhibit G is**  
7 **a true and correct copy of the September 19, 2025 formal meet and confer email.**

8 I declare under penalty of perjury under the laws of the State of California that  
9 the foregoing is true and correct.

10 Executed on September 29, 2025, at Los Angeles, California.

/s/ Jerad J. Miller  
Jerad Miller

**HURRELL CANTRAIL LLP**  
800 WEST 6TH STREET, SUITE 700  
LOS ANGELES, CA 90017-2710  
TELEPHONE (213) 426-2000

# Exhibit G

**Archived:** Monday, September 29, 2025 1:40:31 PM

**From:** Jerad Miller

**Sent:** Fri, 19 Sep 2025 21:03:56 +0000Authentication

**To:** Hang Le; Dale Galipo; Santiago Laurel

**Cc:** Thomas Hurrell; Maricela Gomez; Janet J. Hur; Theresa Cana

**Subject:** Quan v. County of Los Angeles, et al. Meet and Confer

**Importance:** Normal

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Good afternoon Counsel,

As we discussed at Deputy Toves' deposition yesterday, we intend to stipulate to a discovery continuance. Out of an abundance of caution, we are preserving our right to file a motion for summary judgment on qualified immunity grounds and are requesting to meet and confer.

Local Rule 7-3 requires that we meet and confer at least 7 days prior to the filing of any such motion. The current Rule 56 motion cut-off is September 29, 2025. Please let us know if you have any availability later today, or Monday, for a telephone call to discuss the motion.

Best regards,

Jerad J. Miller

Attorney

**Hurrell Cantrall LLP**

800 West 6th Street, Suite 700

Los Angeles, CA 90017-2710

Tel: (213) 426-2000

Fax: (213) 426-2020

[jjmiller@hurrellcantrall.com](mailto:jjmiller@hurrellcantrall.com)

**\*\*\*WE'VE MOVED! PLEASE NOTE THE FIRM'S NEW ADDRESS EFFECTIVE THURSDAY, 06/26/2025\*\*\***

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